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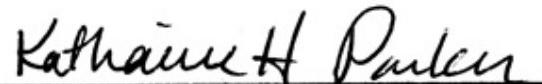
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April 6, 2021

*Via ECF*

Honorable Magistrate Judge Katharine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

**APPLICATION GRANTED**

  
**Hon. Katharine H. Parker, U.S.M.J.**

04/08/2021

Re: *Santos de Oliveira v. Scores Holding Company, Inc., Club Azure, LLC, Robert Gans, Howard Rosenbluth and Mark Yackow, U.S.D.C., S.D.N.Y. Index No. 1:18-cv-06769-GBD*

Your Honor:

On behalf of Defendant Club Azure, LLC (“Club Azure”), I am writing to request a two (2) week extension to file and serve Defendant’s motion for summary judgment, which is due by April 9, 2021, pursuant to your Honor’s Scheduling Order, dated March 18, 2021.<sup>1</sup> Defendant’s request is on consent on condition that Plaintiff’s time to serve and file a cross motion, currently due by April 30, 2021, is likewise extended by two (2) weeks. Defendant’s response thereto is currently due by May 14, 2021 and Plaintiff’s reply is due by May 28, 2021, which both should, respectfully, be extended by two (2) weeks.

The reason for the extension is because, *inter alia*, the undersigned is unable to complete the motion because of prior commitments and a previously scheduled vacation, which the undersigned neglected to consider during the scheduling conference.

This is Defendant’s first request for an extension in this matter.

If Your Honor has any comments or questions, please feel free to contact the undersigned at your earliest convenience. Thank you in advance for the Court’s cooperation and attention to this matter.

<sup>1</sup> Plaintiff voluntary dismissed her Complaint against the remaining defendants via Stipulation, dated and e-filed on March 25, 2021.

Respectfully submitted,



ALISON I. BLAINE  
*Attorney for Defendants*

cc Gennadiy Naydenskiy, Esq./Via ECF  
*Attorneys for Plaintiff*